

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 17-11339TPA
	:	
PHILLIP JOHN McCUMBER and HEATHER	:	
LYNN WILKINSON, his wife,	:	HON. THOMAS P. AGRESTI
Debtors	:	
	:	
UNION HOME MORTGAGE	:	CHAPTER 13
CORPORATION,	:	
Movant,	:	RELATED TO CLAIM NO. 21
	:	
v.	:	
	:	
PHILLIP JOHN McCUMBER and HEATHER	:	
LYNN WILKINSON, his wife; and RONDA J.	:	
WINNECOUR, ESQUIRE, CHAPTER 13	:	
TRUSTEE,	:	
Respondents.	:	

DECLARATION

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,  
INC.

BY: /s/Michael S. JanJanin  
Michael S. Jan Janin, Esquire  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Telephone: 814-833-2222, Extension 1045  
Direct Dial: 814-314-1051  
Facsimile: 814-833-6753  
E-Mail: mjanjanin@quinnfirm.com  
Counsel for Debtors

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WINNECOUR, ESQUIRE, CHAPTER 13 :  
TRUSTEE, :  
Respondents. :

**CERTIFICATE OF SERVICE OF DECLARATION**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on December 13, 2018.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification via the CM/ECF System.

Ronda J. Winnecour, Esquire, Chapter 13 Trustee  
[cmecf@chapter13trusteedpa.com](mailto:cmecf@chapter13trusteedpa.com)

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: December 13, 2018

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,  
INC.

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2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
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Direct Dial: 814-314-1051  
Facsimile: 814-833-6753  
E-Mail: [mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
Counsel for Debtors